

EXHIBIT

A

STATE OF Missouri)
) ss
COUNTY OF Jackson)

AFFIDAVIT OF ZACHARY LAWN

Before me, the undersigned authority, personally appeared Mr. Zachary Lawn, who, being by me duly sworn, deposed as follows:

1. My name is Zachary Lawn. I am of sound mind, capable of making this affidavit, and personally acquainted with the facts herein stated.

2. I work in the banking industry in Kansas City, Missouri, and, due to my professional obligations, training and experience, I understand the requirements of the Fair and Accurate Credit Transactions Act of 2003, as amended ("FACTA").

3. On March 8, 2016, I visited two casinos in Kansas City, Missouri at Plaintiff's counsel's request to determine if NRT Technology Corp.'s ATMs complied with FACTA.

4. The first casino that I visited was Harrah's at 1 Riverboat Drive, North Kansas City, Missouri 64116. I took pictures, and they are labeled Exhibit 1-4. The ATMs' card readers were obstructed to prevent use, and/or the machines would present an error when a card was inserted.

5. The second casino that I visited was the Isle of Capri casino at 1800 Front Street, Kansas City, MO 64120. I took pictures, and they are labeled Exhibit 5-6. Once again, the ATMs' card readers were obstructed to prevent use, and/or the machines would present an error when a card was inserted.

6. All of the ATMs that I assessed are NRT Technology Corp. ATMs, and all of the NRT ATMs at these casinos were clearly being made inaccessible to the casinos' customers.

FURTHER AFFIANT SAYETH NOT.

AFFIANT:



Zachary Lawn

NOTARIZATION

On May, 11, 2016, Zachary Lawn appeared before me, swore to the foregoing and subscribed his name to the foregoing affidavit. In witness whereof I have hereunto subscribed my name and affixed my official seal this 11th day of May, 2016.

Notary Public

My Commission expires: Nov 6, 2018



Exhibit 1

Harrah's - Main gaming floor - NRT ATM/bill-changer
Metal bracket secured to card reader to prevent use.



Exhibit 2

Harrah's - Main gaming floor - NRT ATM/bill-changer
Unobstructed card reader. Machine presents with an error when a card is inserted.

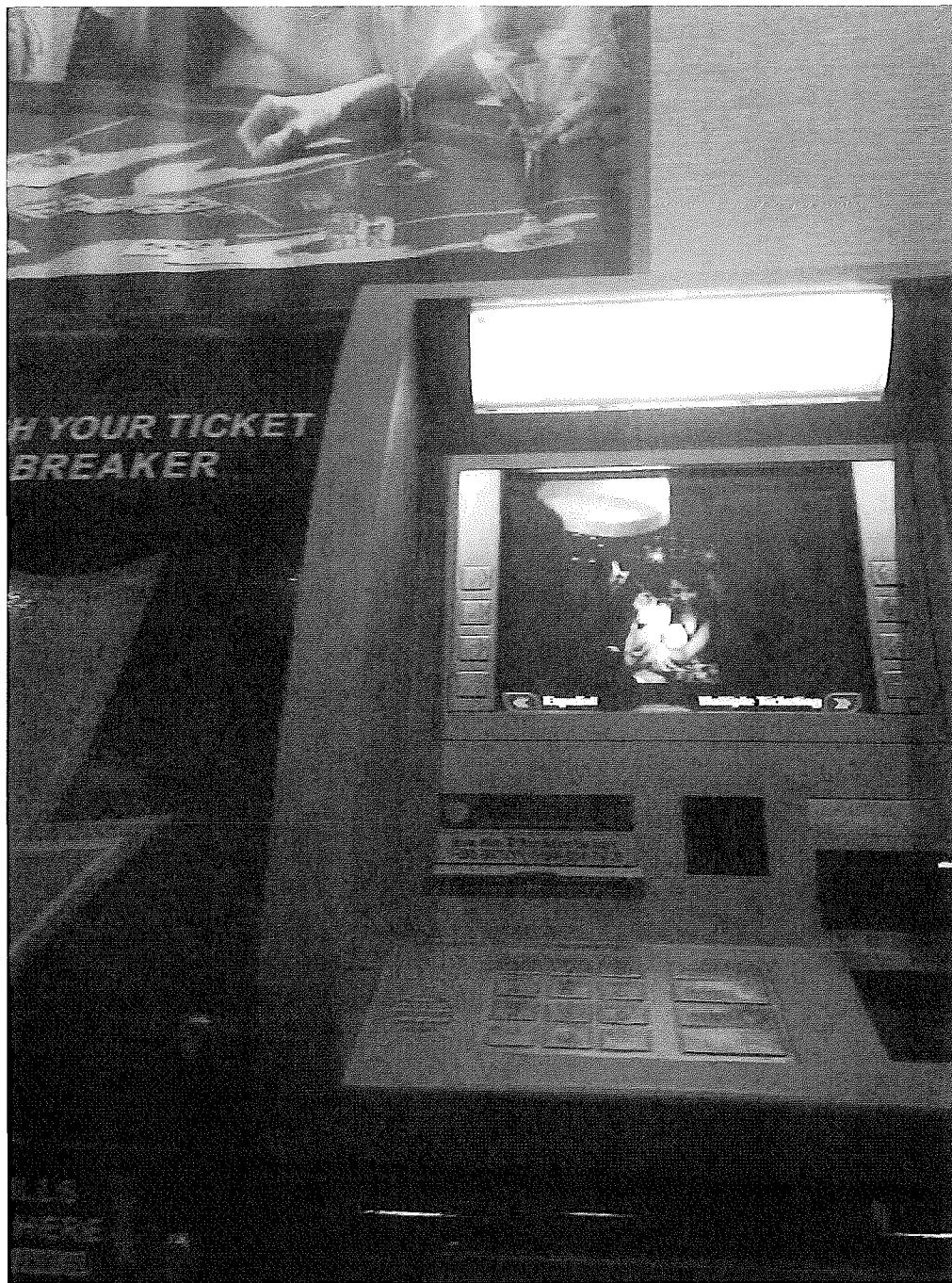


Exhibit 3

Harrah's - Main gaming floor - NRT ATM/bill-changer
Unobstructed card reader. Machine presents with an error when a card is inserted.



Exhibit 4

Harrah's - Main gaming floor - NRT ATM/bill-changer
Unobstructed card reader. Machine presents with an error when a card is inserted.



Exhibit 5

Isle of Capri - Main gaming floor - NRT ATM/bill-changer
Metal bracket secured to card reader to prevent use.

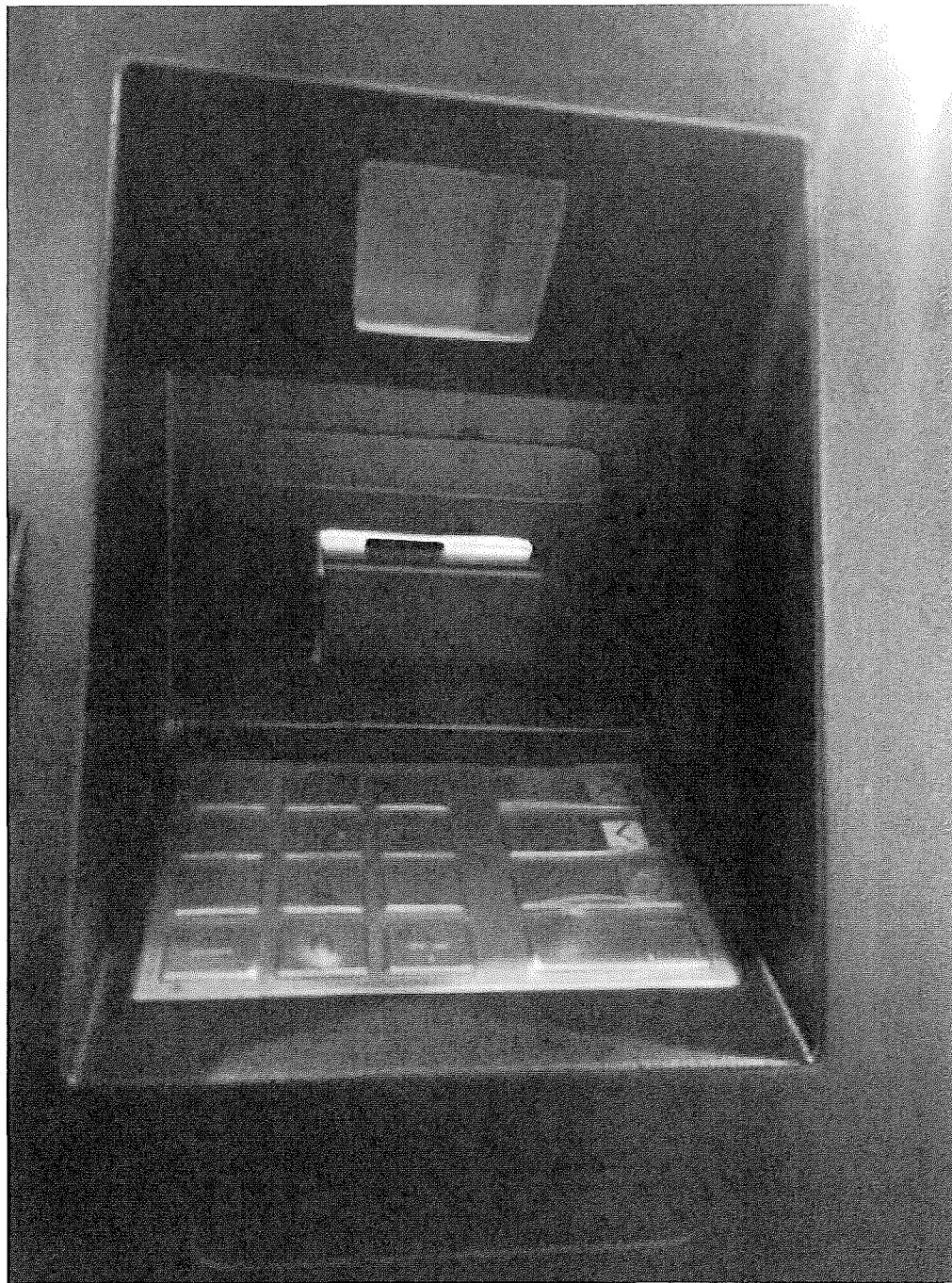


Exhibit 6

Isle of Capri - Main gaming floor - NRT ATM/bill-changer - Unobstructed card reader
Machine presents with an error when a card is inserted.

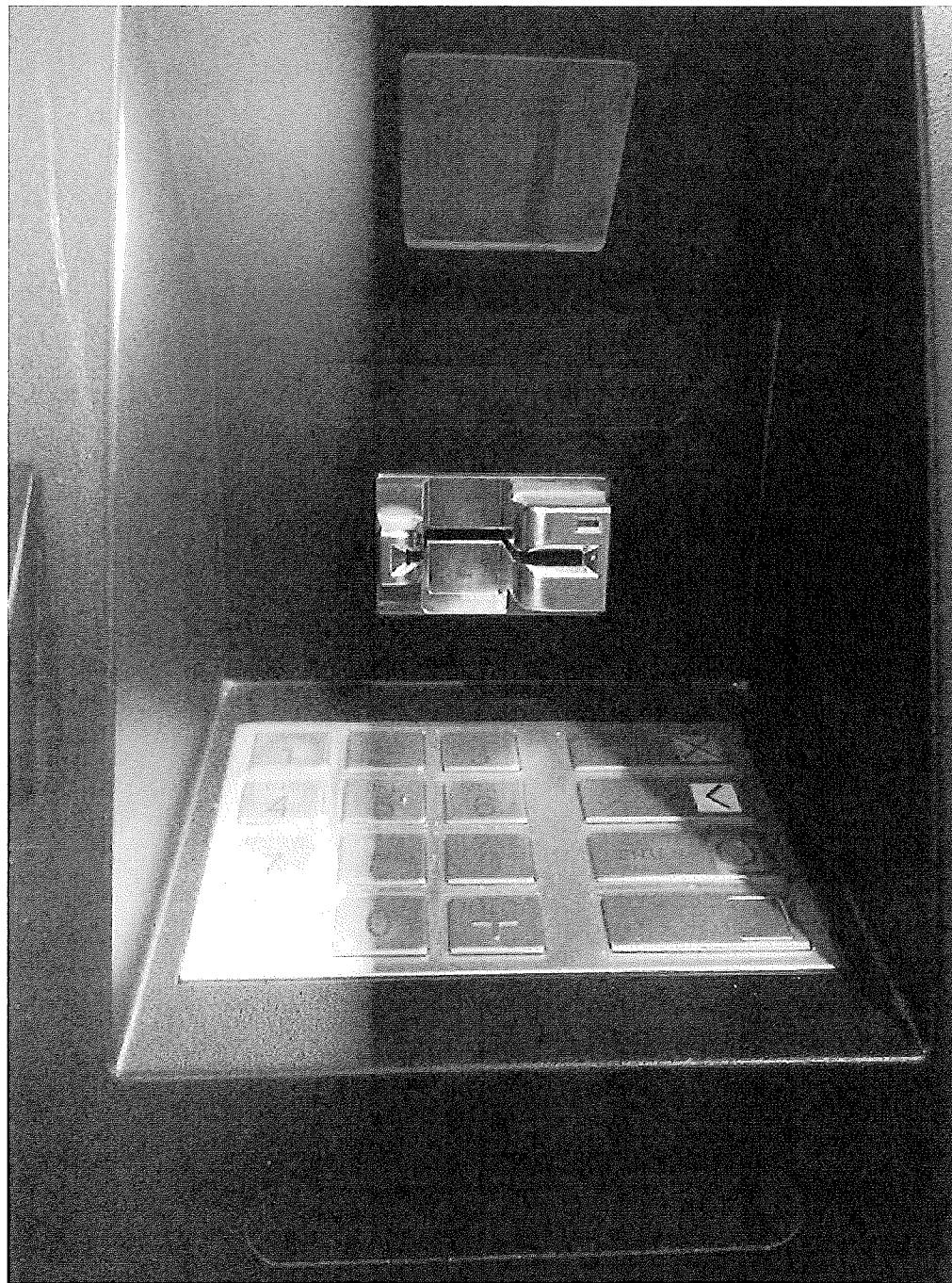


Exhibit 7

Isle of Capri - Main gaming floor - NRT ATM/bill-changer
Unobstructed card reader. Machine presents with an error when a card is inserted.



Exhibit 8

Isle of Capri - Main gaming floor - NRT ATM/bill-changer
Metal bracket secured to card reader to prevent use.

